

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOHNNY B. DELASHAW, JR.,

Plaintiff,

v.

SEATTLE TIMES COMPANY, and
CHARLES COBBS,

Defendants.

CASE NO. 2:18-cv-00537-JLR

DECLARATION OF JESSICA L.
GOLDMAN IN SUPPORT OF SEATTLE
TIMES' MOTION TO SEAL

NOTED: July 8, 2020

I, Jessica L. Goldman, hereby declare:

1. I am one of the attorneys of record for Defendant The Seattle Times Company ("The Seattle Times") in this matter. I am over the age of 18 and make this declaration based on personal knowledge.

2. In anticipation of filing The Seattle Times' Second Motion for Summary Judgment (being filed today), on July 8, 2020, I have communicated with the lawyers for Plaintiff Dr. Delashaw, Defendant Dr. Cobbs, nonparty Swedish Health Services, nonparty Dr. David Newell, and nonparty Dr. Rod Oskouian regarding documents those parties and nonparties designated as "Confidential." As a result of those communications, the designating parties and nonparties have authorized The Seattle Times to file in open court some of the documents they previously designated as "Confidential" or "Private" or "Attorneys Eyes Only" and the Times is doing so

1 today. Those documents that the designating parties and nonparties would not agree could be filed
2 in open court are being provisionally filed under seal by The Seattle Times to allow the
3 designating parties to satisfy their burden of establishing the propriety of their designations.

4 I declare under penalty of perjury under the laws of the United States of America and the
5 State of Washington that the foregoing is true and correct.

6 EXECUTED in Seattle, Washington this 8th day of July, 2020.

7
8 /s Jessica L. Goldman

Jessica L. Goldman, WSBA #21856